U.S. Army Records Management & Declassification Agency

Privacy Act/System of Records Policies

Purpose

To brief the SORN process, clarify when an OMB control number is required and discuss how an OMB control number is obtained through the Army Information Management Control Officer (IMCO) process

Agenda

- **Definition of a SORN**
- **Describe SORN Process**
- **Public Information: Army Information Management Control Officer (IMCO) Process**

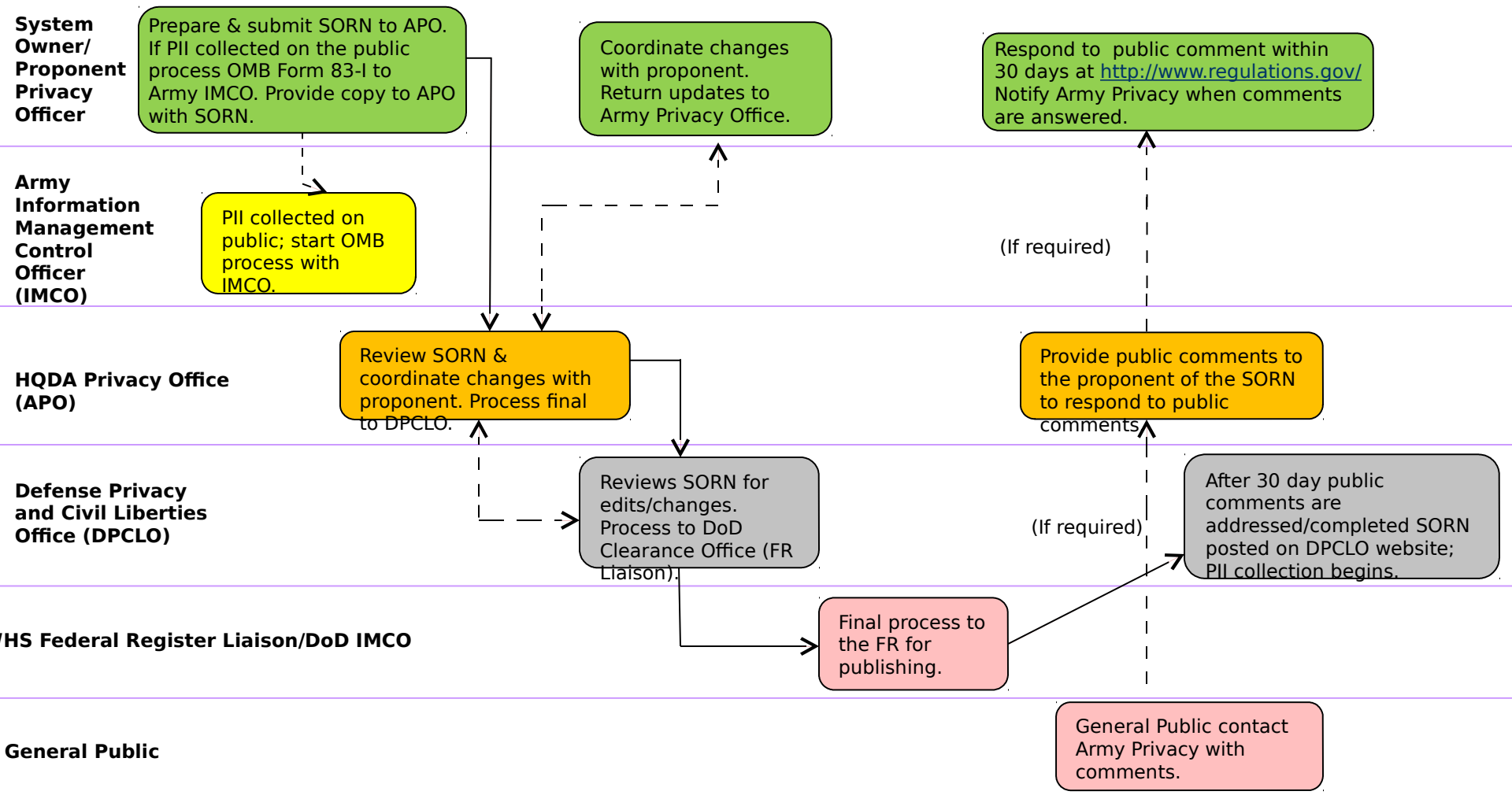
What is a System of Record Notice (SORN)

- Identifies the purpose for the system of records, which individuals are covered by information in the system of records, what categories of records are maintained about the individuals, and how the information is shared by the agency

- Required when all of the following apply:
  - Records are maintained (includes collect, use or disseminate);
  - The records contain information about an individual; and
  - The records are retrieved by a personal identifier (SSN, name, DOB, etc.)

- Published in Federal Register for 30 days to notify public of the authorization to collect and use PII

SORN Process Flow

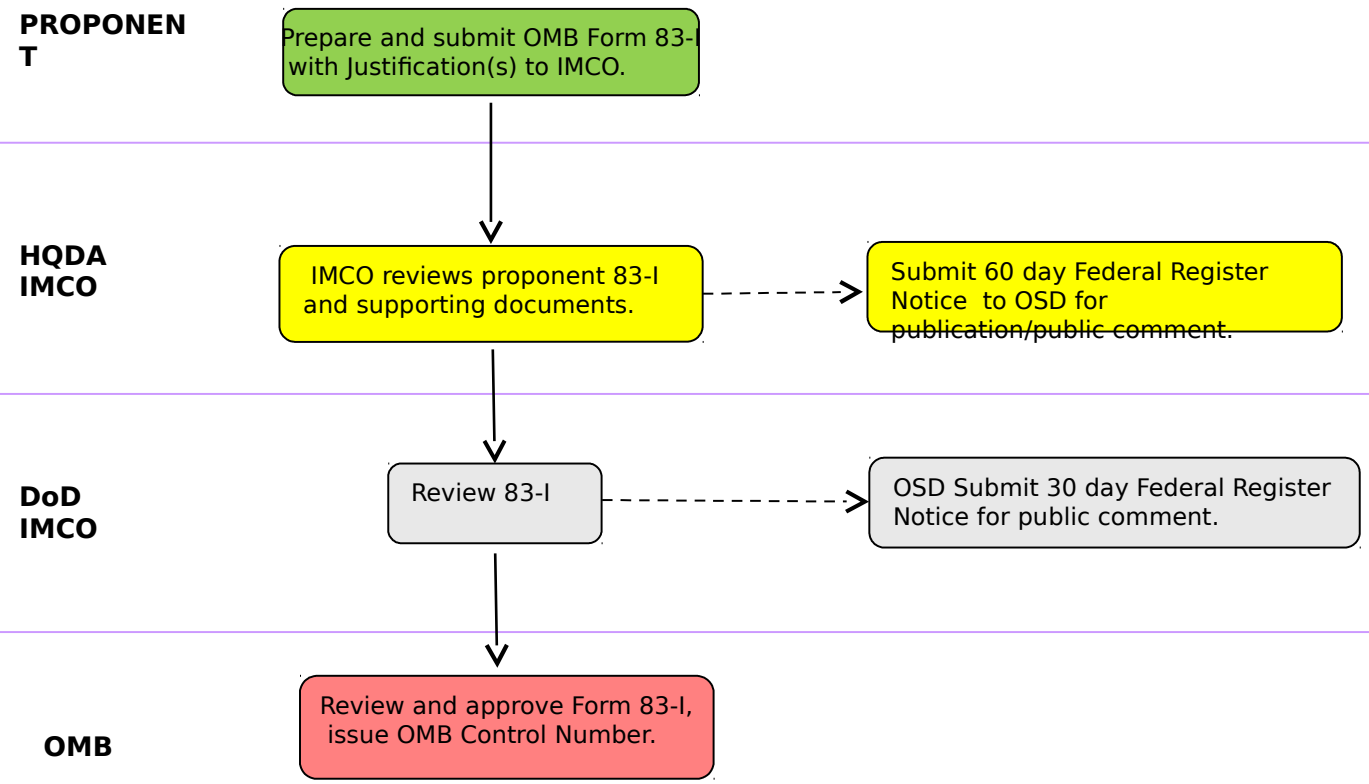

System Owner/ Proponent Privacy Officer
Prepare & submit SORN to APO. If PII collected on the public process OMB Form 83-I to Army IMCO. Provide copy to APO with SORN.
Coordinate changes with proponent. Return updates to Army Privacy Office.
Respond to public comment within 30 days at http://www.regulations.gov/ Notify Army Privacy when comments are answered.
Army Information Management Control Officer (IMCO)
PII collected on public; start OMB process with IMCO.
(If required)
HQDA Privacy Office (APO)
Review SORN & coordinate changes with proponent. Process final to DPCLO.
Provide public comments to the proponent of the SORN to respond to public comments.
Defense Privacy and Civil Liberties Office (DPCLO)
Reviews SORN for edits/changes. Process to DoD Clearance Office (FR Liaison).
(If required)
After 30 day public comments are addressed/completed SORN posted on DPCLO website; PII collection begins.
WHS Federal Register Liaison/DoD IMCO
Final process to the FR for publishing.
General Public
General Public contact Army Privacy with comments.

OMB Control Number Requirements

- Background: One purpose of the Paperwork Reduction Act (PRA), 44 USC, 3501 et seq, is to minimize the paperwork burden on members of the public resulting from the collection of information by or for the Federal Government. Federal Agencies will not collect information from the public without first obtaining OMB approval. AR 335-15, the Management Information Control System (MICS), defines the process for obtaining an OMB Control Number.

- Purpose: An OMB Control Number is required before implementation of a SORN that collects information from the public (but not necessarily before Federal Register publication).

OMB Control Number Process


PROPONENT
Prepare and submit OMB Form 83-I with Justification(s) to IMCO.
HQDA IMCO
IMCO reviews proponent 83-I and supporting documents.
Submit 60 day Federal Register Notice to OSD for publication/public comment.
DoD IMCO
Review 83-I
OSD Submit 30 day Federal Register Notice for public comment.
OMB
Review and approve Form 83-I, issue OMB Control Number.

HQDA Points of Contact

- Privacy Office: Mr. Leroy Jones (703)428-6185/6513
- IMCO: Ms. Sandra Stroud (703)428-6440

QUESTIONS?